

1 Frank A. Silane (State Bar No.: 90940)
2 Jennifer J. Johnston (State Bar No.: 125737)
3 James C. Finney (State Bar No.: 237441)
4 CONDON & FORSYTH LLP
5 1901 Avenue of the Stars, Suite 850
6 Los Angeles, California 90067-6010
Telephone: (310) 557-2030
Facsimile: (310) 557-1299
Email: fsilane@condonlaw.com
Email: jjohnston@condonlaw.com
Email: jfinney@condonlaw.com

7 Attorneys for Defendant
MEXICANA AIRLINES

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

MARICELA RAMIREZ,

Plaintiff.

VS.

UNITED AIRLINES, INC., a foreign corporation; COMPAÑIA MEXICANA DE AVIACION, S.A. DE C.V., a Mexican corporation doing business as MEXICANA AIRLINES (an assumed business name), and JOHN DOES 1 THROUGH 10.

Defendants.

Case No. C 05 4065 WHA

**STIPULATION FOR PROTECTIVE
ORDER AND [PROPOSED]
ORDER THEREON**

Plaintiff MARICELA RAMIREZ and defendant MEXICANA AIRLINES (hereinafter “MEXICANA”), through their respective attorneys of record herein, stipulate as follows:

Recitals

Whereas, Plaintiff has requested that MEXICANA produce a copy of the passenger list for Mexicana flight No. 905 on October 9, 2003 (the “Passenger List”);

1 Whereas, 14 C.F.R. Part 243 prohibits the use or dissemination of passenger
2 lists and contact information for commercial or marketing purposes and prohibits
3 the release of passengers lists and contact information to anyone other than the
4 United States State Department, the National Transportation Safety Board and the
5 United States Department of Transportation.

Stipulation

7 Plaintiff shall not disseminate, transmit or provide access to the Passenger
8 List other than to plaintiff's Pro Hac Vice attorney Thomas J. Flaherty and the staff
9 employed by Thomas J. Flaherty and plaintiff's attorneys at the Law Offices of
10 Sterns & Walker and the staff employed by the Law Offices of Sterns & Walker;

Use of the Passenger List by plaintiff, plaintiff's Pro Hac Vice attorney Thomas J. Flaherty and the staff employed by Thomas J. Flaherty and plaintiff's attorneys at the Law Offices of Sterns & Walker and the staff employed by the Law Offices of Sterns & Walker shall be permitted only for purposes of the litigation in the above-referenced action:

16 Upon a resolution of the above-referenced action either in judgment,
17 dismissal, or settlement, plaintiff shall immediately destroy the Passenger List and
18 all copies or reproductions of the Passenger List.

19 Upon the destruction of the Passenger List, plaintiff's Pro Hac Vice attorney
20 Thomas J. Flaherty shall confirm in writing to MEXICANA, through its attorneys
21 at Condon & Forsyth, LLP, 1901 Avenue of the Stars, Suite 850, Los Angeles,
22 California 90067-6010, that the Passenger List and all copies or reproductions of
23 the Passenger List have been destroyed.

March

Dated: February 13, 2006

THOMAS J. FLAHERTY ATTORNEY
AT LAW

By: Thomas J. Flaherty
THOMAS J. FLAHERTY
Pro Hac Vice Attorney for Plaintiff
MARICELA RAMIREZ

March

Dated: February 21, 2006

STERNS & WALKER

By: Brenda D. Posada
BRENDA D. POSADA
Attorneys for Plaintiff
MARICELA RAMIREZ

Dated: February 17, 2006

CONDON & FORSYTH LLP

By: Frank A. Silane
FRANK A. SILANE
JENNIFER J. JOHNSTON
JAMES C. FINNEY
Attorneys for Defendant
MEXICANA AIRLINES

Good Cause Appearing, IT IS SO ORDERED.

Dated: March 23, 2006



WILLIAM H. ALSUP
United States District Judge